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July 11, 2025

7/11/2025

Via ECF

Hon. Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

SO ORDERED.

LEWIS J. LIMAN
United States District Judge

Re: United States v. LabQ Clinical Diagnostics, LLC, et al.,
22 Civ. 751, 22 Civ. 10313 (LJL)

Dear Judge Liman:

Our office is counsel to Defendants LabQ Clinical Diagnostics, LLC (“LabQ”) and Dart Medical Laboratories, Inc. (“Dart Medical”) in the above-captioned action. We write, however, on behalf of all Defendants named in the Government’s Amended Complaint in Intervention (ECF No. 493) (the “Amended Complaint”), and with the consent of the Government to seek an amended briefing schedule in connection with Defendants’ anticipated motion to dismiss the Amended Complaint.

The Government filed the Amended Complaint on May 19, 2025 pursuant to an agreed upon schedule (*See* ECF No. 491). On June 23, 2025 the Court “So-Ordered” an agreed upon briefing schedule in connection with Defendants’ anticipated motion to dismiss (ECF No. 563).

On July 7, 2025, Michael Yaeger entered an appearance for two newly added Defendants in the Amended Complaint, NJJ Institutions and Congregation Kolel Vyashkem Avraham Inc. (ECF No. 571). After filing an appearance, Mr. Yaeger negotiated a revised briefing schedule in connection with the motion to dismiss. Mr. Yaeger, however, has since withdrawn his appearance. Nonetheless we understand that NJJ Institutions and Congregation Kolel Vyashkem Avraham Inc. are in discussions with successor counsel. In order to ensure a uniform briefing on anticipated motions to dismiss by all Defendants, including NJJ Institutions and Congregation Kolel Vyashkem Avraham Inc., the Government has consented to the below briefing schedule, which we respectfully request the Court “So Order.”

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Deadline	Current Date	Amended date
Defendants' Deadline to Respond to the Amended Complaint	07/17/2025	08/18/2025
Government's Deadline to File an Opposition Brief (if Defendants file a motion to dismiss the Government's Amended Complaint)	08/29/2025	09/30/2025
Defendants' Deadline to File a Reply Brief (if Defendants file a motion to dismiss the Government's Amended Complaint)	09/19/2025	10/21/2025

We thank the Court for its consideration of this request.

Respectfully submitted,

s/ Lee Vartan

Lee Vartan
Member